

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<b>Caption in Compliance with D.N.J. LBR 9004-1</b>	
838104 PHELAN HALLINAN DIAMOND & JONES, PC 1617 JFK Boulevard, Suite 1400 Philadelphia, PA 19103 856-813-5500 Attorneys for QUICKEN LOANS, LLC	
In Re:	
DANIEL J. COSTELLO, JR A/K/A DANIEL JOSEPH COSTELLO	
Debtor	

Case No.: 19-30914 - JNP

Chapter: 13

Judge: JERROLD N. POSLUSNY JR.

### NOTICE OF MORTGAGE FORBEARANCE

The undersigned is the Attorney for Creditor QUICKEN LOANS, LLC in this matter. On or about May 8, 2020, our office was advised that the mortgage loan endingin 8821 (“subject mortgage loan”), secured by real property described as 124 LINCOLN LANE, BERLIN, NJ 08009-1176, was impacted by COVID-19. Pursuant to State and/or Federal guidelines a forbearance was offered, the terms of which are as follows:

1. The parties agree to a forbearance period of three (3) months and Debtor has elected to not tender mortgage payments to Creditor that would come due on the subject mortgage loan starting June 1, 2020 through August 31, 2020.
2. Debtor will resume mortgage payments beginning September 1, 2020 and will be required to cure the delinquency created by the forbearance period (“forbearance arrears”).
3. The payment amount currently is \$2,289.11.
4. The Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. Creditor does not waive its rights under the terms of the note and mortgage or

under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

5. The Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.

6. The Debtor does not waive any rights upon expiration of the forbearance period. Prior to the expiration of the forbearance period, the Debtor must take the following affirmative steps to address the status of the subject mortgage loan including, but not limited to: (a) bringing the account post-petition current; (b) requesting extension of the forbearance period; (c) applying for loss mitigation; and/or (d) amending the Chapter 13 Plan.

7. Any objection to this Notice must be filed and served not later than 14 days after the filing of the Notice. The Court may conduct a hearing on the objection.

**This Notice is intended to disclose a temporary forbearance of the Debtor's obligation to remit post-petition payments for the forbearance period. Nothing within this Notice should be construed to alter any rights, duties, or deadlines that are not related to the remittance of post-petition mortgage payments.**

Dated: May 26, 2020

/s/ Robert J. Davidow  
Robert J. Davidow, Esq.  
Phelan Hallinan Diamond & Jones, PC  
1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103  
Tel: 856-813-5500 Ext. 47960  
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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Phelan Hallinan Diamond & Jones, PC  
1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103  
856-813-5500  
Attorneys for QUICKEN LOANS, LLC

In Re:

DANIEL J. COSTELLO, JR A/K/A DANIEL JOSEPH  
COSTELLO

Case No: 19-30914 - JNP

Hearing Date:

Judge: JERROLD N. POSLUSNY  
JR.

Chapter: 13

**CERTIFICATION OF SERVICE**

1. I, Jessica Gregg:

☐ represent the \_\_\_\_\_ in the above-captioned matter.

☒ am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC,  
who represents QUICKEN LOANS, LLC in the above captioned matter.

☐ am the \_\_\_\_\_ in the above case and am representing  
myself.

2. On May 26, 2020 I sent a copy of the following pleadings and/or documents  
to the parties listed below:

Notice of Mortgage Forbearance

3. I hereby certify under penalty of perjury that the above documents were sent  
using the mode of service indicated.

Dated: May 26, 2020

/s/ Jessica Gregg  
Jessica Gregg

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Daniel J Costello, Jr 124 Lincoln Lane Berlin, NJ 08009-1176	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Eric Clayman, Esquire 412 White Horse Pike Audubon, NJ 08106	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Isabel C. Balboa, Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
US Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	US Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.